

UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

Case No. 05-12241

In re:

Contini, Mark & Donna

OPPOSITION TO DISMISSAL

The debtors, Mark and Donna Contini, are opposed to Trustee's Motion To Dismiss for the following reasons:

1. Debtors will provide the following documents in a timely manner, i.e. before the expiration of the May 24, 2005 deadline.
 - (i) Evidence of property value.
 - (ii) Evidence of all sources of income.
 - (iii) Amended Schedule J with expenses for son.
 - (iv) Amended Plan to devote all disposable income to plan.
 - (v) 2016(b) statement from debtor's counsel.

Wherefore, Debtors, by their counsel, respectfully requests the honorable court to deny Trustee's Motion To Dismiss.

Respectfully submitted,
By Eugene C. Johnson,

May 7, 2005

/s/Eugene C. Johnson, Esq.
BBO #: 659713
264 Broadway – Suite 502
Methuen, Massachusetts 01844
(978) 691-5544

Certificate Of Service

I certify under pains and penalties of perjury that a copy of this motion has been mailed, postage prepaid, to the following on this day, May 7, 2005:

Doreen B. Solomon, Trustee
P.O. Box 8250
Boston, MA 02114

David A. Blomberg
Department Of Revenue
Bankruptcy Unit
P.O. Box 9564
Boston, MA 02114

Town Of Amesbury
62 Friend Street
Amesbury, MA 01913-2882

Capital One
P.O. Box 85147
Richmond, VA 23276

Mass. Electric
Mass. Electric Processing Center
Woburn, MA 01807-0005

MBNA
P.O. Box 15137
Wilmington, DE 19886-5137

T-Mobile
P.O. Box 742596
Cincinnati, OH 45274-2596

Martha J. Awiszus, Esq.
Winokur, Winokur, Serkey & Rosenberg, PC
81 Samoset Street
Plymouth, MA 02360

Washington Mutual, FA
C/o
Joe M. Lozano, Jr.
Brice, Vander Linden & Wernick, PC
9441 LBJ Freeway
Suite 350
Dallas, Texas 75243